

# **EXHIBIT 1**

**Plaintiffs' More Definite Statement as to  
Defendant Mustafa Ahmed Al-Hisawi**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

***Mustaf Ahmed al-Hisawi***

2. Mustaf Ahmed al-Hisawi was born in Jeddah, Saudi Arabia on August 5, 1968. The FBI believes Mustaf Ahmed Adam al-Hisawi is the key for the financial transfers to and from Atta, Al-Shehhi, Binalshibh and Moussaoui. He used several aliases for the transferse, including Hashan Abdulrahman, Hashem Ahmed, Hashim Abdulrahman, Hashim Abdollahi, Mustafa, Fawaz Trading. Sheikh Saaed, Saiid Shaykh, or Saeed Sheikh is an alias. Not to be confused with Omar Saeed Sheikh (involved in the Daniel Pearl assassination).

3. On April 2, 2004, in papers filed to support the first US indictment in the probe, authorities identified the paymaster of the 9/11 attacks as French-Moraccan Mustaf Ahmed al-Hisawi. References to al-Hisawi turned up in the Dublin, Ireland office of the Islamic Relief Agency, a Saudi-backed charity suspected of having links to bin Laden. Al-Hisawi is the target of an international manhunt led by US agents who are probing the funding of bin Laden's al-Qaeda network.

4. Zacarias Moussaoui, a French-Moroccan received operatives from al-Qaeda for the flight training in the Unnited States. The indictment of Moussaoui outlines numerous transactions involving al-Hisawi in the months before the attacks:

On June 25, 2001, he used cash to open a checking account in a Dubai, United Arab Emirates, branch of Standard Chartered Bank. Hijacker Fayed Ahmed Banihammad used cash to open a savings account at the same branch on the same day. Ahmed Bahihammad gave al-Hisawi power of attorney over his savings account on July 18, 2001. The move enabled al-Hisawi to pick up Ahmed Bahihammas's Visa and ATM cards at the bank. Between July 18 and August 1, 2001, al-Hisawi sent the cards to Ahmed in Florida, where he was taking flight courses. The Visa card was then used for the first time on August 1, 2001, in Florida. Visa cards are given to several other hijackers in Dubai, which include Hani Hanjour, Abdulaziz Alomari and Khalid Almihdhar. They open foreign bank and credit card accounts in the UAE and in Saudi

Arabia. Majed Moqed, Saeed Alghamdi, Hamza Alghamdi, Ahmed Alnami, Ahmed Alhaznawi, Wail Alshehri purchase travelers checks in the UAE, presumably with funds given to them when they pass through Dubai. It is believed that "al-Hisawi" is in Dubai every time the hijackers pass through.

On or about August 29, 2001, Ahmed al-Haznawi purchased a ticket on United Airlines Flight 93 from Newark to San Francisco.

On August 22, 2001, Ahmed used the Visa card in Florida to obtain about \$4,900 that had been deposited in the Dubai bank the previous day. The withdrawal was just below the \$5000 threshold that could have triggered the filing of a transaction report the US government. By August 27, Ahmed had used \$4,500 to pay for a first-class seat on United Airlines Flight 175.

On September 6, 2001, Ahmed wired about \$8,055 from Florida SunTrust bank branch to the Dubai account controlled by al-Hisawi. Over the next four days, other hijackers wired \$18,260 to UAE accounts whose holder's names apparently were aliases for al-Hisawi. Separately, Mohamed Atta sent a package from Hollywood, Florida, to Dubai on September 4, 2001. An Arab man picked it up four days later. Agents theorize that the man, who was taped by a security camera, either was al-Hisawi or an associate.

The following is the contact information for SunTrust in Florida:

SunTrust Banks of Florida, Inc.  
200 S. Orange Ave.  
Orlando, Fl. 32801-3410

SunTrust Bank, Central Florida N.A.  
PO Box 3833  
Orlando, Fl. 32802  
Phone-407-237-4141

On September 11, 2001, just hours before the attacks, al-Hisawi emptied Ahmed's Dubai account. He then deposited more than \$22,000 into his own account and prepaid \$40,871 to a Visa card linked to the account. Then he left Dubai for Pakistan. Two days later, al-Hisawi's Visa card was used to make six withdrawals at an ATM in Karachi. Since then, officials say, there has been no sign of him.

5. On Saturday April 3, 2004, Al-Hisawi Company, owned by Mustaf Ahmed al-Hisawi, had its assets frozen by the UN and US for financing terror.

6. Shortly before the hijacking, Mohamed Atta returned the remaining funds that the hijackers did not need to al-Hisawi. On September 8, 2001, Mohamed Atta wired at least \$7,860 back to Mustafa Ahmed al-Hisawi in the emirates. The next day, hijacker Waleed M/ Alshehri wired \$5000 to "Ahmad Mustafa" in the emirates. The day after that, Al-Shehhi wired \$5,400 to "Mustafa Ahmad" in the emirates. On September 11, about \$16,300 was deposited into Mustafa Ahmed al-Hisawi's Dubai bank account. He moves \$6,534 from Fayez Ahmed's account using a check signed and dated September 10. He withdrew most of the remaining money with an ATM card.

7. The hijackers also received substantial amounts of cash from unknown sources. According to the FBI's analysis of their cash flow, the deposits into their bank accounts totaled \$303,481.63. \$167,300, about 55% of the total, was deposited in cash or traveler checks, \$103,200, while 34% of the total, was in the form of wire transfers, which included transfers into the SunTrust from the United Arab Emirates and \$30,300. The remainder characterized as "miscellaneous," which included refunds and checks from third parties. The FBI calculated \$45,550 was spent on airline tickets, \$6,100 was spent on car rentals, \$39,500 was spent on "aviation," which included flight lessons, plane rentals and equipment purchases, \$36,440 was given by checks to individuals, about \$33,000 was spent on lodging and \$33,400 was characterized as "miscellaneous," which included some daily living expenses.

8. On September 6, 2001, \$8,055 was wired from Fayez Ahmed's Florida SunTrust account to the Standard Chartered Bank account. On September 8, 9 and 10, 2001, Marwan al-Shehhi and Atta wired about \$12,860 to "Mustafa Ahmed" in the U.A.E. On September 11, 2001, in U.A.E., at about 9:22 a.m. local time (the early morning hours of Eastern Daylight Time), "Mustafa Ahmed al-Hasawi" shifted \$6,534 from the \$8,055 in Fayez Ahmed's Standard Chartered Bank account into his own account, using a check dated September 10, 2001 and signed by Fayez Ahmed and withdrew approximately \$1,361, nearly all the remaining balance in Ahmed's account and vanished from the United Arab Emirates. ("Banihammad Fayez" boarded Flight 175 on September 11th who the FBI assumed was Fayez Ahmed.)

9. Mustaf Ahmed al-Hisawi is wanted for two terrorist-related indictments in the US. He is listed as an unindicted co-conspirator in the case against Zacarias Moussaoui, the only person facing trial in the US as part of the 9/11 plot.